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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE: §
§
SHORES PROPERTIES, L.P., § **CASE NO: 10-34904-s gj-11**
DEBTOR § **CHAPTER 11**
§

EMERGENCY MOTION TO ASSUME/APPROVE ESCROW AGREEMENT

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

COMES NOW SHORES PROPERTIES, L.P., the Chapter 11 Debtor in the above styled and referenced bankruptcy case (the “Debtor”), and files this its Emergency Motion to Assume/Approve Escrow Agreement pursuant to 11 U.S.C. § 365 of the Bankruptcy Code and in support of same would respectfully show the following:

1. On July 12, 2010, the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code. The Debtor is now operating its business and managing its property as a debtor in possession pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code. No request has been made for the appointment of a trustee or examiner and no official committee has yet been appointed.
2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue of the Chapter 11 case and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. Debtor requests the Court to enter an Order approving the Escrow Agreement attached hereto as Exhibit "A."

4. The Escrow Agreement provides for the use of HOA dues to pay ongoing operations of the Debtor's business. The Debtor intends to reorganize its affairs.

5. This is an emergency matter since the Debtor has no other sources of funding available to it and must rely on the use of HOA dues to continue its operations. The escrow arrangement is intended to protect the HOA and its members while permitting the payment of ongoing operations of the Debtor.

6. This motion is supported by the Request for Expedited Hearing filed contemporaneously herewith.

WHEREFORE, PREMISES CONSIDERED, Debtor requests that the Court enter an Order approving the Escrow Agreement and for such other and further relief to which the Debtor may show itself justly entitled.

DATED August 5, 2010

Respectfully submitted,

/s/ Joyce W. Lindauer
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(PROPOSED) ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that on August 5, 2010, a true and correct copy of the foregoing document was sent by first class, United States mail to the United States Bankruptcy Trustee and those persons on the attached Service List.

ATTACH SERVICE LIST

/s/ Joyce W. Lindauer
Joyce W. Lindauer